

## **REMARKS**

Claims 1-21 and 30-50, 52-64 are pending in this application. Claims 1 and 30 have been amended. Claims 1, 30, 34, 55, 63 and 64 are the independent claims. Claims 63 and 64 are new. Applicants have submitted fees with this submission totaling \$162.00 (for one (1) independent claims in excess of the five (5) already paid for, and two (2) total claims in excess of the fifty-three (53) already paid for); however, if payment is deficient please debit the Deposit Account 50-1660.

### **Allowable Subject Matter**

Applicants thank the Office for indicating claims 34-50, 55-58 and 62 allowed. Also, Applicants thank the Office for indicating that claims 52-54 contain allowable subject matter.

### **Claim Rejections – 35 U.S.C. § 103(a) of Claims 1-21**

The Office has rejected **Claims 1-4, 10-12, 15, 16**, as being unpatentable over Keim (4,430,914) in view of Mutti, et al. (4,778,382), and further in view of Atake (6,325,607), and yet, further in view of Hevenor, et al. (5,661,515).

#### **Claim 1**

Claim 1, as amended, requires, in part, "a drive assembly adapted to selectively engage the strip through said guide structure". Support for amended claim 1 is found, at least, at Page 12, Lines 1-11, of the Detailed Description of the Invention.

In rejecting Claim 1, the Office states Keim teaches "a stationary guide structure for positioning and guiding the strip in the apparatus (items 40, 42, 44 and 46 - figure 7a; column 3, lines 25-30)" and "a drive assembly adapted to selectively engage and feed the

strip through the guide structure in a sequence of uniform increments (item 60 – figure 2)". Keim fails to teach the drive assembly-guide structure interaction as required in amended claim 1. Claim 1 requires a stationary guide structure, and a drive assembly adapted to selectively engage the strip through the guide structure. Item 60, a web advancing unit (see Col. 3, Line 45 of Keim), of Keim does not, and is not able to, engage the strip through said guide structure (Items 40, 42, 44 and 46 of Keim). Thus, Keim fails to disclose a drive assembly adapted to selectively engage the strip through the guide structure, as required by Claim 1. Further, Mutti, Atake and Hevenor fail to cure the deficiencies of Keim and therefore, Keim in view of Mutti, and further in view of Atake, and yet, further in view of Hevenor fails to disclose, or render obvious, all elements of claim 1. Applicants respectfully request the Office withdraw the rejection of claim 1 and the claims that depend therefrom (Claims 2-4, 10-12, 15 and 16).

Further, the Office uses the above discussed rejection of Claim 1 being unpatentable over Keim in view of Mutti, and further in view of Atake, and yet, further in view of Hevenor along with various combinations of the cited references of Ekendahl, Fritz et al., Arends, Dupraz, Desnick, Wheaton, III, et al., Straumanis and Oster et al. to render Claims **5-9, 13, 14 and 17-21** obvious. These references taken alone or in combination with the combination of Keim in view of Mutti, and further in view of Atake, and yet, further in view of Hevenor fail to cure the deficiencies of Keim in view of Mutti, and further in view of Atake, and yet, further in view of Hevenor discussed above. As claims 5-9, 13, 14 and 17-21 depend from Claim 1, and require all elements thereof, Keim in view of Mutti, and further in view of Atake, and yet, further in view of Hevenor in combination with the above cited references cannot render claims 5-9, 13, 14 and 17-21 obvious. Applicants respectfully request withdrawal of these rejections.

**Claim Rejections – 35 U.S.C. § 103(a) of Claims 30-33 and 59-61**

Claim 30

The Office has rejected **Claims 30 and 59-61**, as being unpatentable over Bippus (3,577,700) in view of Atake (6,325,607).

Claim 30, as amended, requires, in part, “a vertical heat shield assembly comprising at least two vertically oriented heat shields operated from a common pneumatic actuator adapted to selectively, vertically interpose a heat shield between each contact surface and the strip when the process is paused”. Support for amended claim 30 is found, at least, at Page 25, Lines 9-14, of the Detailed Description of the Invention and Figures 18 and 19.

As mentioned, the Office has rejected claims 30 and 59-61 as being obvious over Bippus in view of Atake. The Office uses item 85 – figure 8 and column 10, lines 55-65 of Atake in view Bippus and the rest of Atake to reject the heat shield limitations of claim 30 and its dependent claims. As seen in Fig. 8, item 85 of Atake is a horizontally oriented heat shield and is used in a horizontal heating process. The cited item of Atake and any combination of Bippus in view of Atake fail to disclose, or provide a rational for rendering obvious, a vertical heat shield assembly having at least two vertically oriented heat shields and a pneumatic actuator adapted to vertically interpose a heat shield between each contact surface and the strip. Thus, Bippus in view of Atake fails to teach, disclose or render obvious all limitations of claim 30 and the dependent claims (claims 59-61).

Therefore, Applicants respectfully request the Office withdraw the rejections.

Claims 31 and 32

The Office has rejected **Claims 31 and 32**, as being unpatentable over Bippus (3,577,700) in view of Atake (6,325,607), and further in view of Desnick (3,642,411).

The Desnick reference, or any combination of Desnick with Bippus and Atake (see remarks regarding claim 30), fails to disclose, or provide a rational for rendering obvious, a vertical heat shield assembly having at least two vertically oriented heat shields and a pneumatic actuator adapted to vertically interpose a heat shield between each contact surface and the strip. Thus, Bippus in view of Atake, and further, in view of Desnick fails to teach, disclose or render obvious all limitations of claims 31 and 32. Therefore, Applicants respectfully request the Office withdraw the rejections.

Claim 33

The Office has rejected **Claim 33**, as being unpatentable over Bippus (3,577,700) in view of Atake (6,325,607), and further, in view of Dupraz (5,437,546).

The Dupraz reference, or any combination of Dupraz with Bippus and Atake (see remarks regarding claim 30), fails to disclose, or provide a rational for rendering obvious, a vertical heat shield assembly having at least two vertically oriented heat shields and a pneumatic actuator adapted to vertically interpose a heat shield between each contact surface and the strip. Thus, Bippus in view of Atake, and further, in view of Dupraz fails to teach, disclose or render obvious all limitations of claim 30. Therefore, Applicants respectfully request the Office withdraw the rejection.

Conclusion

In view of the above remarks and amendments to the claims, Applicants believe that all pending claims in the present application are in condition for allowance. Finally, the absence of additional patentability arguments should not be construed as either a disclaimer of such arguments or that such arguments are not believed to be meritorious.

Respectfully Submitted,

/anthony j. bourget/

By: Anthony J. Bourget  
Attorney for Applicants  
Registration No. 36,753

Bourget Law, S.C.  
Anthony J. Bourget  
1119 Regis Court, Suite 110  
P.O. Box 81  
Eau Claire, WI 54702-0081